

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION TO EXTEND PAGE LIMITATION FOR CLASS  
CERTIFICATION OPENING BRIEF, SUPPORTING MEMORANDUM, AND  
CERTIFICATE OF CONSULTATION**

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Plaintiffs, through counsel, move for leave to file an opening brief in support of their forthcoming motion for class certification in excess of the page limitation set forth in Local Rule 7.2(e).<sup>1</sup> In support of this motion, Plaintiffs state as follows:

1. Under Local Rule 7.2(e), a memorandum in support of a motion shall not exceed 20 pages in length unless otherwise ordered by the Court.
2. On January 6, 2023, this Court issued an Order on the Motion to Extend Page Limitations for Class Certification Briefing that was brought by the Plaintiffs in *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.* See 2:20-cv-02600-SHL-cgc (W.D. Tenn.), ECF 311 (“*Fusion Order*”). In light of the complexity of that case, the Court granted the *Fusion* Plaintiffs’

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<sup>1</sup> The filing deadline for Plaintiffs’ motion for class certification is February 10, 2023. ECF 342 at 2.

request for an additional 10 pages for their memorandum in support of their motion for class certification, for a total of 30 pages. *Fusion Order*, at 3.

3. The indirect purchasers' forthcoming motion for class certification in the *Jones* action is equally complex, also with multiple factual allegations and elements.

4. Plaintiffs believe that for the same reasons expressed in the *Fusion* Plaintiffs' motion, the Court will benefit from allowing Plaintiffs the same page increase as the Court granted in the *Fusion* Order.

5. Plaintiffs remain cognizant that concision remains a goal.

6. Accordingly, Plaintiffs move for the same relief extended by the Court in the *Fusion* Order, and ask the Court for leave to allow an additional 10 pages for Plaintiffs' memorandum in support of class certification, for a total of 30 pages.

7. On January 10, 2023, pursuant to Local Rule 7.2(a)(1)(B), counsel for the parties met and conferred regarding this motion. Defendants do not oppose.

Dated: January 10, 2023

Respectfully submitted,

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**CERTIFICATE OF CONSULTATION**

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on January 10, 2023, my colleague, David Seidel, met and conferred with counsel for Defendants (specifically Matt Mulqueen) advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. Mr. Mulqueen confirmed that Defendants do not oppose the requested relief.

*/s/ Joseph R. Saveri*

Joseph Saveri